

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION

United States of America,

Plaintiff,

v.

Case No. 18-20075

Adam Dean Brown,

Honorable Sean F. Cox

Defendant.

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**ORDER STRIKING DOCKET ENTRY NO. 191**

Defendant Adam Dean Brown (“Defendant”) is represented by counsel in this action and is scheduled to be sentenced by this Court on October 13, 2021.

Nevertheless, acting *pro se*, on August 9, 2021, Defendant filed a “Motion for Compliance with CJA-24” (ECF No. 191).

Since Defendant has counsel, Defendant is attempting to proceed in a “hybrid” fashion, both through his counsel and *pro se* by way of his motion. *See McKaskle v. Wiggins*, 465 U.S. 168, 183 (1984). Although the Sixth Amendment guarantees defendants the right to conduct their own defense and even represent themselves, *see Farretta v. California*, the right of self-representation does not include the right to proceed in a hybrid manner. *McKaskle*, 465 U.S. at 183; *see also United States v. Mosely*, 810 F.2d 93, 97-98 (6th Cir. 1987). This Court will not allow Defendant to proceed in a hybrid manner in this action.

Accordingly, **IT IS ORDERED** that Docket Entry No. 191 is hereby **STRICKEN**.

**IT IS SO ORDERED.**

s/Sean F. Cox

Sean F. Cox

United States District Judge

Dated: September 2, 2021

I hereby certify that a copy of the foregoing document was served upon counsel of record on September 2, 2021, by electronic and/or ordinary mail.

s/J. McCoy

Case Manager